

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Donald Boyd  
Debtor

Donald Boyd  
Movant  
v.

Shellpoint Mortgage Servicing as  
servicer for US Bank Trust National  
Association, Not In Its Individual  
Capacity But Solely As Owner  
Trustee For VRMTG Asset Trust  
KENNETH E. WEST - Trustee  
Respondents

Case No.: 24-10850-amc

Chapter: 13

Chief Judge: Ashely M. Chan

Hearing Date:  
January 28, 2025, at 11:00 am

**LIMITED OBJECTION TO DEBTOR'S MOTION TO SELL**

Shellpoint Mortgage Servicing as servicer for US Bank Trust National Association, Not In Its Individual Capacity But Solely As Owner Trustee For VRMTG Asset Trust ("Secured Creditor") is a secured creditor in the above Bankruptcy and by its undersigned counsel hereby makes a limited objection to the Debtor's Motion to Sell the real property located at 47 Marboro Lane, Willingboro, NJ 08046 as follows:

1. Secured Creditor is a lien holder of the Debtor with a mortgage lien on the real property owned by Debtor and located at 8716 Macon Street, Philadelphia, PA 19152 ("Property").

2. On March 13, 2024, Debtor filed the instant Chapter 13 Bankruptcy Petition.

3. On May 22, 2024, Secured Creditor or its predecessor in interest filed Proof of Claim 3-1, setting forth a total claim in the amount of \$ 251,564.25, and a pre-petition arrearage in the amount of \$ 65,140.54.

4. As of December 31, 2024, the payoff for this loan is approximately \$256,790.98.

5. Secured Creditor does not object to the sale of the Property; however, Secured Creditor submits this limited response seeking assurance that any Order granting the Motion includes a provision which states that Secured Creditor will be paid in full on the closing date from a payoff statement which will be provided at closing.

6. Secured Creditor requests that the Court Order allowing sale of the real property provide that the lien of Secured Creditor attach to the proceeds of sale pending full payoff as agreed.

**WHEREFORE**, Secured Creditor respectfully requests that the Debtor's Motion be granted to the extent outlined above and for all other and further relief as is just and proper.

Dated: January 6, 2025

By: /s/ Lauren M. Moyer  
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